

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	Case No. 1:21-cr-00083
)	
)	Count One: 18 U.S.C. §§ 2252(a)(1)
)	and (b)(1) (Transportation of Child
v.)	Pornography)
)	
)	Count Two: 18 U.S.C. §§ 2252(a)(2)
)	and (b)(1) (Receipt of Child
)	Pornography)
MAJED TALAT HAJBEH,)	
a/k/a "Abu Khaled,")	Count Three: 18 U.S.C.
)	§§ 2252(a)(4) and (b)(2) (Possession
)	of Child Pornography)
)	
<i>Defendant.</i>)	Forfeiture Notice

INDICTMENT

April 2021 Term—Alexandria

COUNT ONE

(Transportation of Child Pornography)

THE GRAND JURY CHARGES THAT:

From in and around May 2018, through in and around June 2020, at or near Woodbridge, Virginia, in the Eastern District of Virginia, the defendant, MAJED TALAT HAJBEH, a/k/a "Abu Khaled," using an Apple iPhone 8 Plus cellular phone bearing International Mobile Equipment Identity (IMEI) 356710085352882, knowingly transported and attempted to transport visual depictions using any means or facility of interstate or foreign commerce, and in and affecting interstate or foreign commerce, by any means including by computer, the producing of which visual depictions involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct.

(In violation of Title 18, United States Code, Sections 2252(a)(1) & (b)(1).)

COUNT TWO

(Receipt of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

From in and around May 2018, through in and around June 2020, at or near Woodbridge, Virginia, in the Eastern District of Virginia, the defendant, MAJED TALAT HAJBEH, a/k/a “Abu Khaled,” using an Apple iPhone 8 Plus cellular phone bearing International Mobile Equipment Identity (IMEI) 356710085352882, knowingly received and attempted to receive visual depictions using any means or facility of interstate or foreign commerce, and which visual depictions had been transported in and affecting interstate or foreign commerce, by any means including by computer, the producing of which visual depictions involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct.

(In violation of Title 18, United States Code, Sections 2252(a)(2) & (b)(1).)

COUNT THREE

(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 23, 2020, at or near Woodbridge, Virginia, in the Eastern District of Virginia, the defendant, MAJED TALAT HAJBEH, a/k/a “Abu Khaled,” using a HP Omni All-In-One Computer with serial number 4CS223074X, knowingly possessed matter containing visual depictions which had been transported using any means or facility of interstate or foreign commerce, and in affecting interstate or foreign commerce, by any means including by computer, the producing of which visual depictions involved the use of a minor engaging in sexually explicit conduct, and which visual depictions were of such conduct.

It is further alleged that one or more visual depictions involved in the offense involved a prepubescent minor or a minor who had not attained 12 years of age.

(In violation of Title 18, United States Code, Sections 2252(a)(4)(B) & (b)(2).)

FORFEITURE NOTICE

THE GRAND JURY FURTHER CHARGES that there is probable cause that the property described below is subject to forfeiture.

Pursuant to Federal Rule of Criminal Procedure 32.2(a), the defendant is hereby notified that, if he is convicted of the offense charged in this Indictment, he shall forfeit to the United States his interest in:

1. any and all matters that contain any visual depiction of a minor engaging in sexually explicit conduct in violation of the charged offenses;
2. any property, real or personal, constituting or traceable to gross profits or proceeds obtained from the offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of the offense, and any property traceable to such property.

The property subject to forfeiture includes, but is not limited to: (a) one (1) Apple iPhone 8 Plus cellular phone bearing International Mobile Equipment Identity (IMEI) 356710085352882; and (b) one HP Omni All-In-One Computer with serial number 4CS223074X.

(In accordance with 18 U.S.C. § 2253 and Fed. R. Crim. P. 32.2(a).)

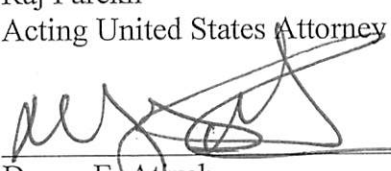
A TRUE BILL

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

Foreperson of the Grand Jury

Raj Parekh
Acting United States Attorney

By:



Danya E. Atiyeh
James P. Gillis
Seth Schlessinger
Assistant United States Attorneys